

Daniel B. Olmos (SBN: 235319)
NOLAN BARTON & OLMOS LLP
430 D. Street
Davis, CA 95616
(650) 326-2980 (t)
(650) 327-9704 (f)
dolmos@nbo.law

Attorney for Defendant
Balbino Sablad

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BALBINO SABLAD,

Defendant.

Case No. 2:21-cr-00138 TLN

**STIPULATION AND ORDER TO
CONTINUE STATUS HEARING**

IT IS HEREBY STIPULATED AND AGREED between the Government, through Assistant United States Attorney Rosanne Rust, and Defendant Balbino Sablad, through his undersigned counsel, that the status hearing in this matter be continued from January 13, 2022, to March 17, 2022, to permit defense counsel adequate time to review discovery produced by the government and to conduct defense investigation. The Court signed the order substituting undersigned defense counsel into the case on December 29, 2021, *see* Docket No. 21, the parties stipulated to a protective order, and the court entered the protective order on January 6, 2022. Docket No. 23. Now that the protective order is in place, the government is in the process of producing discovery to the defense.

1 The parties further agree and request that the Court order, for the purpose of computing time
2 under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which the trial of this case must
3 commence, that the time period between January 13, 2022, to and including the March 17, 2022, status
4 hearing, be excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and B(iv) and Local Code T4 to allow
5 defense counsel reasonable time to review the discovery and prepare his client's defense. The parties
6 stipulate and agree that the ends of justice served by granting this time exclusion would outweigh the
7 best interest of the public and the defendant in a speedy trial.
8

9 For the foregoing reasons, the parties stipulate to continue the status conference to March 17,
10 2022, at 9:30 a.m.

11 IT IS SO STIPULATED.

12 Dated: January 10, 2022

NOLAN BARTON & OLMOS, LLP

13
14 /s/ Daniel B. Olmos

Daniel B. Olmos

15 Attorney for Defendant Balbino Sablad

16 Dated: January 10, 2022

PHILLIP A. TALBERT

17 United States Attorney

18 By: /s/ Rosanne Rust

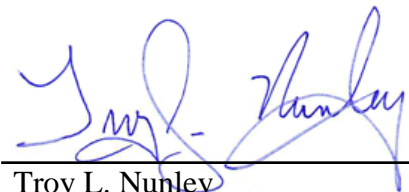
19 Rosanne Rust

20 Assistant United States Attorney
21
22
23
24
25
26
27

ORDER

GOOD CAUSE HAVING BEEN SHOWN, and pursuant to the stipulation by the parties, it is hereby ordered that the status hearing for defendant Balbino Sablad be continued to March 17, 2022, at 9:30 a.m. It is further ordered that, for the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., the time period between January 13, 2022, to and including March 17, 2022, be excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and B(iv) and Local Code T4, and that the ends of justice served by granting this time exclusion outweigh the best interest of the public and the defendant in a speedy trial.

DATED: January 10, 2022



Troy L. Nunley
United States District Judge